

**From:** "Howard Stern" <howard.stern@ferrostaal.com>  
**To:** "FR0001" <FR0001@ustr.gov>  
**Date:** Tue, Dec 4, 2001 5:31 PM  
**Subject:** RE: Request to exclude Products from Import relief Under section 203

Public Document

Office of the U.S. Trade Representative  
600 17th Street N.W.  
Washington D.C. 20508

Attn : Gloria Blue , Executive Secretary , Trade Policy , Staff Committee  
cc Andrew Stephens , Director of Steel Trade Policy , Office of the  
United States Trade Representative

Re : Carbon and Alloy Steel Long Products , Carbon Steel Billets with  
Carbon over 0.25 Pct or more

We hereby request exclusion of the following Carbon Steel Long  
Products/Billets which have the corresponding HTSUS number 7207.20.00.25

a) Designation of Product - Hot Rolled Carbon Steel Square Billets with  
Round Corners ( also called Round Corner Square Billets ) according to  
AISI/SAE 1548 modified . The HTSUS number for this commodity is  
7207.20.00.25

b) Product Description -

1) Chemistry in %

Carbon - 0.44-0.53

Manganese - 1.10-1.40

Silicon 0.15-0.35

Phosphorous 0.02 maximum

Sulphur 0.025 maximum

Aluminum 0.040 maximum

Chromium 0.10-0.20

minor residuals of other elements may exist

2) Metallurgical Properties - Fully killed , Fine grain , Vacuum Degassed ,  
Ingot Cast , Hot Rolled

3) Sizes - ( All Squares with Round Corners in Inches)

5.500" Square , 5.750" Square , 152 mm Square , 6.000" Square , 6.500"  
Square , 6.750" Square , 7.000" Square

Tolerances on square as per mill standard or by mutual agreement .

4) Length - 16-32 FT with 15 Pct maximum in shorts 12-16 FT

5) Surface - Hot Rolled - As Rolled

c) Basis for requesting Exclusion - On October 22,2001 the U.S. International Trade Commission ( Commission)made a negative injury determination with respect to "Carbon and Alloy Ingots Billets and Blooms ". These products are defined by the Commission as follows " Ingots , Billets and Blooms . Ingots are the primary form into which steel is cast when produced by other than continuous casting . Blooms and Billets are semi finished products of rectangular cross section with a width of less than two times the thickness if of Carbon Steel or less than four times the thickness if of alloy steel .Includes other products of solid cross section which have not been further worked than subjected to primary hot rolling or roughly shaped by forging , including tube rounds and blanks for angles , shapes or sections . Carbon and Alloy Steel Ingots , Billets and Blooms are provided for in the following HTS subheadings  
7206100000 7207190030 7207200090 7224900005 7224900075  
7206900000 7207190090 7224100005 7224900045  
7207110000 7207200075 7224100075 7224900065

Clearly the AISI /SAE 1548 Carbon Steel Square Billets described above fall within the category of " Ingots , Billets and Blooms " for which the Commission made a determination of no injury . That is square billets are semi finished products of rectangular cross section with a width less than two times the thickness if of Carbon Steel . However the HTSUS subheading for this product is 7207.20.00.25 which is not listed above . This tariff falls under the grouping " Carbon and Alloy Flat Products", as per the attachment in the June 22,2001 letter from the U.S. Trade Representative to the Commission .

d) Names and Locations of 1) U.S. producers 2) Foreign  
d1) U.S. Producers  
The Timken Co. Republic Technologies International  
1835 Dueber Ave SW 3770 Embassy Parkway  
Canton , Ohio Akron, Ohio 44333-8367  
44706-6932

d2) Foreign Producers  
We do not know the foreign producers who may currently supply this item .  
However the following mill is capable to supply this item  
Acominas Brazil  
Rodovia MG 443 km 5  
CEP 36406-000 Ouro Branco MG Brazil

There may be other mills throughout the world who can supply this item.

e) total U.S. consumption by quantity and value 1996-2000 and projected annual consumption for each year 2001 -2005. -- Unknown

f) total U.S. production of the product for each year from 1996 -2000 if any  
----- Unknown

g) The identity of any U.S. substitute for the product .-- We are not aware of substitutes for this product .

Thank you for your consideration of this request and please to not hesitate to contact the undersigned if you have any questions or need additional information .

Howard Stern

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